

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HAYNES INTERNATIONAL, INC.,)	
a Delaware corporation)	
Plaintiff,)	Civil Action No. 04-197(E)
v.)	JURY TRIAL DEMANDED
ELECTRALLOY, a Division of G.O.)	Judge Cohill
CARLSON, INC.,)	
a Pennsylvania corporation)	
Defendant.)	
)	

**DEFENDANT ELECTRALLOY'S MOTION TO SEAL EXHIBITS B, C AND E TO ITS
OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY**

Defendant, Electralloy ("Electralloy" or "Defendant"), by its undersigned counsel, moves the Court to file the accompanying Exhibits B, C, and D to Defendant's Opposition to Plaintiff's Motion to Compel Discovery under seal. These three Exhibits consist of deposition transcript testimony of Defendant's witnesses that was designated "attorneys eyes only" pursuant to the Stipulated Protective Order entered by the Court in this matter on February 17, 2005. Consequently, Defendant respectfully requests that the Court grant this request that its Exhibits B, C and D to Defendant's Opposition to Plaintiff's Motion to Compel be filed under seal.

A Proposed Form of Order is attached hereto.

Respectfully submitted,

BLANK ROME LLP

Dated: November 16, 2005

By:


Timothy D. Pecsenye
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CERTIFICATE OF SERVICE

I, Emily J. Barnhart, hereby certify that on this 16th day of November, 2005, a true and correct copy of the foregoing MOTION TO SEAL was served on the attorneys for Plaintiff by U.S. First Class Mail, postage prepaid, addressed as follows:

Lynn J. Alstadt, Esquire
Bryan H. Opalko, Esquire
BUCHANAN INGERSOLL PC
One Oxford Centre
301 Grant Street
Pittsburgh, Pennsylvania 15219



EMILY J. BARNHART



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November 16, 2005

BY FEDERAL EXPRESS®

Clerk's Office
United States District Court
For the Western District of Pennsylvania
17 South Park Row
Erie, PA 16501

Re: Haynes International, Inc. v. Electralloy
Civil Action No. 04-197(E)

Dear Sir or Madam:

Enclosed for filing in the above-referenced action please find Defendant's Motion to Seal Exhibits B, C and E to Defendant's Opposition to Plaintiff's Motion to Compel. Per previous instruction from the Clerk's Office, we also enclose a disc containing PDF versions of the Motion, proposed order and sealed exhibits. Defendant filed its Opposition to Plaintiff's Motion to Compel Discovery, omitting the confidential exhibits, today electronically.

Thank you for your assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "T. D. Pecsenye". Below the signature, the name "TIMOTHY D. PECSENYE" is printed in capital letters.

TDP:jaq
Enclosures
cc: Lynn J. Alstadt, Esquire